

Lewis E. Bradford,
Plaintiff,

Case No. 17-cv-00191-jdp

v.

Brandon Amez,
Defendant.

EXHIBIT

Motion for Discovery



I am filing this motion for discovery. The discovery request details are as follows:

- i) All internal documents including but not limited to training manuals of the Hillside Police Department, Elroy Police Department and the Venango County Sheriff's Department, Policy and Practice materials, whether in physical or electronic form containing the phrases or pertaining to the subject of;
 - A) Highspeed chase or pursuit, exceeding posted speed limits (with reference to pursuing or following a suspect in a motor vehicle, criteria for initiating and/or terminating a high speed chase or pursuit, deployment of tire spikes or any other form of suspect vehicle interdiction).
 - B) use of deadly force, firing or discharging a service weapon;
 - C) multi-jurisdictional communication and/or cooperation in locating and/or apprehending suspects in a motor vehicle whether high speed is involved or not; and

- D) use of dash and Body cam video equipment both manually and automatically.
- d) Any and all Dash cam and Body cam video ^{and audio} of any and all members of law enforcement, their vehicle or any vehicle and officer present or any way involved in the underline matter. Including but not limited to officers Todd Kruger, officer Brandon Arnez, Deputy Millmore, Deputy Lawrence Howell, Deputy William Zirk, Sgt. Patrick Clark, Officer Ryan Williams, officers Frederick vonruden, Sgt. Holtz, Chief Richardson, and officer Grover Wooken.
- 3) Any and all sound files and notes pertaining to and transcriptions of any and all electronic means of communication (radio, cell phone) in any way involved in the underline matter, including dispatch logs, records, transcriptions and recordings.
- 4) Service records of all responding Law Enforcement officers to be examined for:
- A) use of deadly force, discharge of service weapon and los,
- B) High speed pursuit or chase or apprehension of suspect(s) in a motor vehicle determining whether any such incidents resulted in any warning, oral or written or any disciplinary action or procedural disposition including terms and cause for end of employment. Including Defendants terms and cause for end of employment with the Hillsboro Police Department.

- 5) All reports, transcripts, notes, radar of speed and arrest records of Seagunt Butcher who was driving a Red 2007 Buick with Minnesota plates registered to Mr. Byrd. And was apprehended in Dane County for a high speed chase through Union Center shortly before Mr. Byrd's arrest.
- 6) Radar issued for the red 2013 Lexus that Mr. Byrd was driving, to determine Mr. Byrd's speed at the time of the shooting.
- 7) Any and all eyewitness statements, dispositions and law enforcement notebook and other written entries concerning the events. Including but not limited to George Staumer the civilian that pulled over at the scene of the shooting and the unnamed witness who entered Mr. Byrd's vehicle to put it into park.
- 8) Any and all photos, videos and 3-D images made of the scene of Mr. Byrd and officer Krueger's squad, including accident reports, any investigation reports done by the Wisconsin State Patrol traffic reconstruction unit and any and all reports by all agencies involved.
- 9) Any and all reports and records of phone calls, text, emails and any and all other forms of communication to the D.C.I. (Department of Criminal Investigation) pertaining to the investigation of this case.

- i) Any and all reports and records of Forensics reports pertaining to the investigation of the officer involved shooting of Mr. Byrd. Any reinvestigation reports, all photos, video of Mr. Byrd's vehicle.
- ii) Any and all data downloaded from Mr. Byrd's 2013 Lexus' computer system.

Dated: 2/5/18

Signed: Lewis E. Byrd III

Lewis E. Byrd III

pro se -